

FILED

JUN 09 2025

Clerk, U.S. Courts
District Of Montana
Billings Division

ZENO B. BAUCUS
Assistant U.S. Attorney
U.S. Attorney's Office
2601 Second Avenue North
Suite 3200
Billings, MT 59101
Phone: (406) 657-6101
FAX: (406) 657-6989
E-mail: zeno.baucus@usdoj.gov

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA,	CR 25-71- BLG-SPW
Plaintiff,	MJ-25-55-BLG-TJC
vs.	INFORMATION
USMAN HANIF KHAN,	USE OF FACILITY IN INTERSTATE
Defendant.	COMMERCE IN AID OF
	RACKETEERING
	Title 18 U.S.C. § 1952(a)(3)
	(Penalty: Five years imprisonment, \$250,000
	fine, three years supervised release)

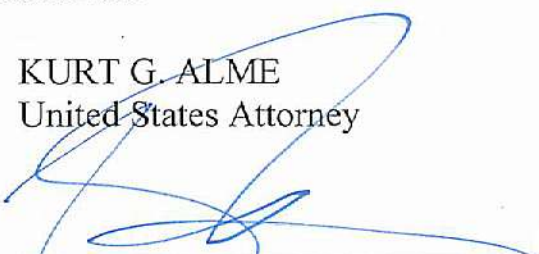
THE UNITED STATES ATTORNEY CHARGES:

That on and around April 9, 2023, at Billings and within Yellowstone
County, in the State and District of Montana, the defendant, USMAN HANIF


KHAN, used a facility in interstate commerce, the internet and a cellular telephone, with the intent to promote, manage, establish and carry on, and facilitate the promotion, management, establishment and carrying on, of unlawful activity, that is, promotion of prostitution with respect to Jane Doe in violation of the laws of the State of Montana and the United States, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, in violation of 18 U.S.C. § 1952(a)(3).

DATED this 9th day of June 2025

KURT G. ALME
United States Attorney



ZENO B. BAUCUS
Assistant United States Attorney
Attorney for Plaintiff



KURT G. ALME
United States Attorney



CYNDEE L. PETERSON
Criminal Chief Assistant U.S. Attorney